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10 *Attorney for Chandan Manansingh*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 THE UNITED STATES OF AMERICA,
14
15 Plaintiff,

16 vs.

17 CHANDAN MANANSINGH
18
19 Defendants.

CASE NO. 2:15-cr-00070-RFB

**STIPULATION AND ORDER TO
CONTINUE HEARING REGARDING
REVOCATION OF SUPERVISED
RELEASE
(FOURTH REQUEST)**

20 **IT IS HEREBY STIPULATED AND AGREED** by and between Daniel G. Bogden,
21 United States Attorney, Phillip N. Smith, Assistant United States Attorney; and Vincent Savarese
22 III, Esq., of the law firm of Gentile Cristalli Miller Armeni Savarese, attorney for Defendant
23 Chandan Manansingh ("Mr. Manansingh"), that the hearing regarding Revocation of Supervised
24 Release currently scheduled for Thursday, September 22, 2016 at 10:00 a.m. be continued for
25 forty-five (45) day period or to a date and time convenient to this Honorable Court.

26 This Stipulation is entered into for the following reasons:

27 1. That Mr. Manansingh's previous attorney, Stephen Stein, Esq. has become
28 gravely ill and is currently hospitalized at Summerlin Hospital and is unable to continue on with
the representation of Mr. Manansingh in this matter.

2. That Mr. Manansingh's family has therefore decided to retain new counsel for
Mr. Manansingh.

3. That the undersigned new counsel for Mr. Manansingh was just retained to

1 substitute in as new counsel in this matter on September 20, 2016.

2 4. That counsel for Mr. Manansingh has not yet had an adequate opportunity to
3 review the discovery in the matter or otherwise to familiarize himself with the facts and
4 circumstances applicable herein.

5 5. That the Assistant United States Attorney has no objection to the continuance of
6 the revocation hearing.

7 6. That Mr. Manansingh has no objection to the continuance of the revocation
8 hearing.

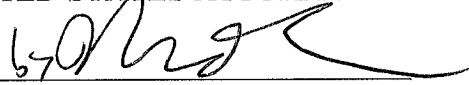
9 7. That this is the fourth request for a continuance of the revocation hearing;
10 however, it is the first request by the undersigned new counsel.

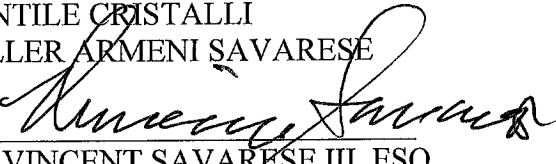
11 Dated this 21st day of September, 2016.

Dated this 21st day of September, 2016.

12 DANIEL BOGDEN
13 UNITED STATES ATTORNEY

GENTILE CRISTALLI
MILLER ARMENI SAVARESE

14 By: 
15 PHILLIP SMITH
16 Assistant United States Attorney
Attorney for Plaintiff,
UNITED STATES OF AMERICA

By: 
VINCENT SAVARESE III, ESQ.
Attorney for Defendant,
CHANDAN MANANSINGH

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 THE UNITED STATES OF AMERICA,

CASE NO. 2:15-cr-00070-RFB

4 Plaintiff,

5 vs.

**STIPULATION AND ORDER TO
CONTINUE HEARING REGARDING
REVOCATION OF SUPERVISED
RELEASE
(FOURTH REQUEST)**

6 CHANDAN MANANSINGH

7 Defendants.

8
9 **FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

10 Based upon the pending Stipulation of counsel, and good cause appearing therefor, the
11 Court hereby finds that:

12 1. That Mr. Manansingh's previous attorney, Stephen Stein, Esq., has become
13 gravely ill and is currently hospitalized at Summerlin Hospital and is unable to continue on with
14 the representation of Mr. Manansingh in this matter.

15 2. That Mr. Manansingh's family has therefore decided to retain new counsel for
16 Mr. Manansingh.

17 3. That the undersigned new counsel for Mr. Manansingh was just retained to
18 substitute in as new counsel in this matter on September 20, 2016.

19 4. That counsel for Mr. Manansingh has not yet had an adequate opportunity to
20 review the discovery in the matter or otherwise to familiarize himself with the facts and
21 circumstances applicable herein.

22 5. That the Assistant United States Attorney has no objection to the continuance of
23 the revocation hearing.

24 6. That Mr. Manansingh has no objection to the continuance of the revocation
25 hearing.

26 7. That this is the fourth request for a continuance of the revocation hearing;
27 however, it is the first request by the undersigned new counsel.
28

8. Denial of this request for continuance would deny the parties herein time and opportunity within which to effectively and thoroughly research, and prepare for the revocation hearing regarding supervised release, taking into account the exercise of due diligence.

9. Additionally, denial of this request for continuance would result in a miscarriage of justice.

10. For all the above-stated reasons, the ends of justice would best be served by a continuance of the revocation hearing.

CONCLUSION OF LAW

1. Based on the fact that counsel have agreed to a continuance of the trial date, the Court hereby concludes that:


2. The ends of justice are served by granting a continuance and outweigh the best interest of the public and the Defendants' right to a speedy hearing, since the failure to grant a continuance would be likely to result in a miscarriage of justice, as it would deny the parties herein sufficient time, and the opportunity, within which to effectively and thoroughly prepare for trial taking into account the exercise of due diligence.

ORDER

IT IS HEREBY ORDERED That the Revocation Hearing scheduled for Thursday, September 22, 2016 at 10:00 a.m., be CONTINUED.

IT IS FURTHER ORDERED That the Revocation Hearing in the above-captioned matter will be continued to the 29th day of November, 2016 at the 11:30 a.m., in LV Courtroom 7C.

DATED this 22nd day of September _____, 2016.


RICHARD F. BOULWARE, II
United States District Judge